

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>JAMES LEIGHTY, ASHLEE</b>	§	
<b>LIEGHTY and AMANDA HELTON,</b>	§	
<b>each INDIVIDUALLY, and AS HEIRS</b>	§	
<b>TO THE ESTATE OF ROBERT</b>	§	
<b>EUGENE LEIGHTY, DECEASED</b>	§	
<i>Plaintiffs,</i>	§	<b>CIVIL ACTION NO. 3:19-cv-2615</b>
 <b>v.</b>	§	
 <b>STONE TRUCK LINE, INC. and</b>	§	
<b>JARMANJIT SINGH</b>	§	
<i>Defendants.</i>	§	

**DEFENDANTS STONE TRUCK LINE, INC. AND JARMANJIT SINGH'S  
MOTION TO TRANSFER VENUE**

**COME NOW**, Defendants Stone Truck Line, Inc. and Jarmanjit Singh ("Defendants") in the above entitled and numbered case, and files this their Motion to Transfer Venue from the Dallas Division of the Northern District of Texas to the Amarillo Division of the Northern District of Texas pursuant to 28 U.S.C. § 1404(a), along with the accompanying Brief in Support, and respectfully shows the Court as follows:

**I. THIS CASE SHOULD BE TRANSFERRED TO THE AMARILLO DIVISION.**

1. This case involves a motor vehicle accident that occurred on Interstate 40 in Wheeler County, Texas. *See* Plaintiffs' Original Complaint [DOC 1], ¶¶ 9—10. No parties reside in the Dallas Division. *See* Plaintiffs' Original Complaint, [DOC 1], ¶¶ 1—6.

2. The private and public convenience factors weigh heavily in favor of transferring this case from the Dallas Division to the Amarillo Division of the Northern District—specifically, the convenience of non-party witnesses. Transfer will therefore be in the interest of justice and for the convenience of the parties and witnesses in this lawsuit. For the reasons set forth in the accompanying Brief, this Court should transfer the case to the Amarillo Division.

**WHEREFORE, PREMISES CONSIDERED**, Defendants Stone Truck Line, Inc. and Jarmanjit Singh respectfully pray that the Court (1) grant their *Motion to Transfer Venue* and enter an order transferring venue of the suit to the Amarillo Division of the Northern District; and (2) for such other and further relief to which Defendants may be entitled under law and equity.

Respectfully submitted,

By: /s/ David L. Sargent  
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**ATTORNEYS FOR DEFENDANTS**  
**STONE TRUCK LINE, INC. AND**  
**JARMANJIT SINGH**

**CERTIFICATE OF CONFERENCE**

I certify that I complied with the meet and confer requirement Local Rule CV-7.1 via a phone call and email correspondence with Plaintiff's counsel, R. Reagan Sahadi, on November 22, 2019, regarding the matters set forth in the foregoing motion. In response, Plaintiff's counsel has advised that he is **OPPOSED** to the Motion.

*/s/ Martha M. Posey*  
**MARTHA M. POSEY**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 25<sup>th</sup> day of November 2019, a true and correct copy of the foregoing document was served via ECF to Plaintiff's attorneys of record:

R. Reagan Sahadi  
Sahadi Legal Group  
414 S. Tancahua Street  
Corpus Christi, Texas 78401

*/s/ David L. Sargent*  
**DAVID L. SARGENT**

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